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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DON'T SHOOT PORTLAND, et al.

Plaintiffs

v.

CITY OF PORTLAND, a municipal
corporation,

Defendant.

Case No. 3:20-cv-00917-HZ

DECLARATION OF TERI JACOBS IN
SUPPORT OF PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION

I, Teri Jacobs, declare as follows pursuant to 28 USC § 1746:

1. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.

2. On August 3rd, 2020, I attended a protest in Southeast Portland. It started at Laurelhurst Park, I arrived around 9:00pm that night to a crowd of over 150 people gathered around the Penumbra Kelly Building.

3. I arrived at the Penumbra Kelly Building and stood on Burnside Street, taking photos and documenting the protest. From the sidewalk on Burnside Street, I took pictures of the police officers standing outside of the building, as well as an inflatable pig that a protester had brought to the event.

4. No more than thirty minutes after I had arrived, PPB officers ran out from the Penumbra Kelly Building parking lot and into the crowd gathered on Burnside Street. I do not remember them announcing that it was an unlawful assembly or a riot. They only yelled at us to, "Move back."

5. Police pushed us east on Burnside Street. When they first made contact with the crowd, I was not standing nearest to the police, but as they pushed the crowd east, I was within the shoving and swinging range of the oncoming officers. I saw them knock over everyone who was too slow to sprint away from them as they swung their batons into the crowd.

6. I tried to help people who had been knocked to the ground, but it was extremely difficult to lift people up while the police continued to run at us with their batons out.

7. Within seconds of the police sprinting at the crowd, I saw a friend of mine, who was carrying a rolling speaker, struggling to run at the pace the officers were forcing us to move at. I stayed near the line of officers to make sure that she did not trip over her speaker, but continued to disperse to the East as they yelled at us to, "Move back."

8. The officers repeatedly bull-rushed at the crowd. They would run at us at full speed, extending their batons in front of them and knocking over everyone in their path. The officers would then stop briefly, and protesters would try to help those who had been pushed down to the ground. Officers would then start sprinting at us again, forcing us to run more.

9. After a few of these pushes, a police officer made physical contact with me and shoved me with her baton to force me to move faster. While I was moving in the direction she shoved me, a different officer ripped my protective goggles off of my face, and pepper sprayed me directly in the eyes.

10. I was unable to see and I called out for a medic, as I couldn't tell if any of my friends were nearby. A medic helped move me to the sidewalk and poured water on my face. I held on to the medic because I couldn't see the medic, or any of my surroundings, but the medic kept telling me to move because the officers were right behind us, running once again.

11. Despite being in immense pain, I managed to remove my contact lenses which were coated in pepper spray.

12. The medic who was assisting me managed to pull me onto a different street, though I still could not see and was in a tremendous amount of pain. I gave this medic my cell phone and asked for them to call my friends for help.

13. A nearby homeowner came out of her home, concerned about my injury. She turned on her garden hose and doused my eyes and face for over thirty minutes. One of her family members, who I could only identify by voice, brought me a towel from their home as I was soaked with water and pepper spray.

14. I have photos and videos documenting Portland Police Bureau's use of force, and have a photograph of the specific officer who ripped off my goggles and pepper sprayed me.

15. I believe in the continued importance of the protests and would like to attend protests in the future. I worry that I will be injured again. I have purchased more protective gear to avoid injuries from the Portland Police. I have been attending protests since they started on May 29, 2020, and at the time of this incident had attended roughly 5 to 6 protests per week.

16. It is important to me to express my extreme frustration with the systemic racism that is rampant in the police force, and to do what I can to bring attention to the ongoing brutality that PPB inflicts on people daily. I do fear for my personal safety when I attend protests, as I know police will not help me after they injure me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 12, 2022.



Teri Jacobs